

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RAMON OCASIO FONTANEZ  
FLOR M. CRUZ DELGADO  
Debtor

CASE NO.: 11-00888 BKT

CHAPTER 13

**STATEMENT OF PURPOSE FOR AMENDED PLAN 05/17/11**

TO THE HONORABLE COURT:

COME NOW DEBTORS, Ramón Ocasio Fontanez and Flor M. Cruz Delgado through its undersigned counsel of record and before this Court most respectfully states and prays:

1. Pursuant to Local Bankruptcy Rule 1009-1 debtors hereby provide a Statement of Purpose as to Amended Chapter 13 plan dated 05/17/11.

2. The amended plan also includes a provision for payment to Trustee of tax refunds.

WHEREFORE, Debtor most respectfully requests that this Court take note of aforementioned amendment.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 17 day of May, 2011.

**I HEREBY CERTIFY THAT:** a copy of the instant statement and amended plan has been sent via regular mail to all parties in attached master address list. to **Chapter 13 Trustee**, José R. Carrión Morales, thru the Court's ECM/ECF noticing system and notified via ECM/ECF system to all appearing parties.

/s/ NOEMI LANDRAU RIVERA  
USDC 215510  
PO Box 270219  
San Juan, PR 00927-0219  
TEL. 787-774-0224  
FAX: 787-793-1004  
landraulaw@prtc.net

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:

RAMON OCASIO FONTANEZ

FLOR M. CRUZ DELGADO  
DEBTOR(S)

BK CASE # 11-00888 BKT

CHAPTER 13

CHAPTER 13 PAYMENT PLAN 05/17/11

- 1 - The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 5/17/11

☒ PRE ☐ POST-CONFIRMATION

☐

AMENDED PLAN DATED: \_\_\_\_\_

FILED BY ☐ DEBTOR ☐ TRUSTEE ☐ OTHER

1. PAYMENT PLAN SCHEDULE

\$ 350.00 x 60 = \$21,000.00  
\$ x =  
\$ x =  
\$ x =  
\$ x =  
TOTAL = \$21,000.00

Additional Payments:

\$ to be paid as a LUMP SUM  
within with proceeds to come from

☐ Sale of property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above.

\$ x =

PROPOSED BASE: \$21,000.00

III. ATTORNEY'S FEES

(To be paid as administrative expenses)

Outstanding balance as per Rule 2016(b) Fee

Disclosure Statement: \$ 3,000.00

Signed: /s/ Ramon Ocasio Fontanez  
DEBTOR

/s/ Flor M. Cruz Delgado  
JOINT DEBTOR

/s/ Noemi Landrau Rivera  
Attorney for debtor

11 DISBURSE FUNDS IN THE FOLLOWING ORDER AFTER ADMINISTRATIVE EXPENSES

A- ADEQUATE PROTECTION PAYMENTS CR \$

B. SECURED CLAIMS.

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. Cr. Cr.  
# # #  
\$ \$ \$

2. ☐ Trustee pays IN FULL Secured Claims

Cr. Cr. Cr.  
# # #

3. ☐ Trustee pays VALUE OF COLLATERAL

Cr. Cr. Cr.  
# # #  
\$ \$ \$

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ OTHER:

6. ☒ Debtor Otherwise maintains regular payments directly to:

R-G Mortgage/ Scotiabank

C. PRIORITIES. The Trustee shall pay priorities in accordance with the law.  
(11 U.S.C. § 507 and § 1322 (a)(2))

D. UNSECURED CLAIMS. Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A- ☐ Co-debtor Claims / ☐ Other:

☐ Paid 100% / ☐ Other:

Cr. Cr. Cr.  
# # #

(b) ☐ Other:

2. Unsecured Claims otherwise receive PRO-RATA disbursements

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecured, etc.)

1. Notice to all parties in interest as per attached master address list.
2. Any disposable income from tax refund commencing on tax year 2011 received by Debtor during the plan will be brought to the plan for the benefit of creditors, Debtor to obtain prior Court authorization for the use of any funds.

OCASIO FONTANEZ, RAMON  
URB. MANSIONES DEL CARIBE  
183 CALLE AQUAMARINA H-7  
HUMACAO, PR 00791

FIA CARD SERVICES  
PO BOX 15026  
WILMINGTON, DE 19886-5026

CRUZ DELGADO, FLOR M  
URB. MANSIONES DEL CARIBE  
183 CALLE AQUAMARINA H-7  
HUMACAO, PR 00791

FIRST BANK  
PO BOX 8318  
SAN JUAN, PR 00910-0318

Cervoni Landrau & Associates  
PO BOX 270219  
SAN JUAN, PR 00715-0370

R-G MORTGAGE CORP.  
PO BOX 362394  
SAN JUAN, PR 00936-2394

BANCO POPULAR  
PO BOX 71375  
SAN JUAN, PR 00936-7077

R-G PREMIER BANK  
PO BOX 2510  
GUAYNABO, PR 00970-2510

BEST BUY  
HSBC RETAIL SERVICES  
PO BOX 60148  
CITY OF INDUSTRY, CA 91716-0148

SCOTIABANK  
PO BOX 362649  
SAN JUAN, PR 00936-2649

CITI CARDS  
PO BOX 182564  
COLUMBUS, OH 43218-2564

SEARS CARD  
PO BOX 6924  
THE LAKES, NV 88901-6924

CITI CARDS  
PO BOX 6077  
SIOUX FALLS, SD 57117-6077

SEARS CREDIT CARDS  
PO BOX 183081  
COLUMBUS, OH 43218-3081

CITIFINANCIAL  
PO BOX 70919  
CHARLOTTE, NC 28272-0919

TRANSUNION  
PO BOX 1000  
CHESTER, PA 19022

EQUIFAX  
PO BOX 740241  
ATLANTA, GA 30374

VICTORIA 'S SECRET  
WORLD FINANCIAL NETWORK NATIONAL  
BANK  
PO BOX 182273  
COLUMBUS, OH 43218-2273

EXPERIAN  
PO BOX 2002  
ALLEN, TX 75013